

Attachment A

AFFIDAVIT OF CARMEN BIN LADIN

PERSONALLY APPEARED BEFORE ME, Carmen Bin Ladin, who being duly sworn hereby states and affirms:

1. I am over the age of 18 and I make this statement from my own personal knowledge.
2. On February 1, 2006, I executed an affidavit in support of Plaintiffs' Opposition to the Motion to Dismiss filed by Yeslam Bin Ladin.
3. I have read the Defendant's Motion to Strike my affidavit, which in essence alleges that the information contained in my February 1, 2006 affidavit is not based on my personal knowledge, an allegation that is categorically false.
4. Counsel for Yeslam Bin Ladin suggests in the Motion to Strike that I have not had meaningful contact with Yeslam since 1988 and therefore could not be speaking from my own personal knowledge about any of the matters to which I attest that post-date 1988. See Motion to Strike at 10.
5. Apparently Yeslam Bin Ladin's counsel have failed to consult with their client on this issue because since the filing of Defendant's Motion to Strike, Yeslam Bin Ladin himself is quoted in two international journals admitting that he continued to have communications with me through 1994. See *Wall Street Journal*, April 5, 2006 at A1, A16. (Attached) See also *Sunday Times* (London), April 9, 2006. (Attached)
6. In his Motion to Strike, Yeslam grossly misleads the Court by suggesting that it has been two decades since I have been in contact with Yeslam or the Bin Ladin family, when writing of my February 1, 2006 affidavit, "In fact, virtually all of her "testimony" pertains to events that purportedly transpired after she left Saudi Arabia and lost contact with Yeslam and the Binladin family nearly two decades ago." Motion to Strike at 11.

7. The events that I described in my affidavit are based on my personal knowledge derived directly from conversations with Yeslam Bin Ladin through August 1994, the year we filed for divorce, as well as from the twelve years of litigation surrounding our divorce, which only reached a final adjudication in March of this year, 2006, even after Yeslam's Motion to Strike was filed with this Court.
8. In the twelve years of litigating our divorce, I have investigated and educated myself as much as conceivably possible as to Yeslam's business interests, and those of the Bin Ladin family, in the United States and throughout the world, so as to protect, as best I could, my own interests as well as those of our three daughters.
9. My statements under oath are not motivated by self-interest but are descriptive of the information that I gained over the course of my thirty-two year marriage to and divorce from Yeslam.
10. Moreover, while I have not been physically in the Kingdom of Saudi Arabia since 1986, my personal knowledge of Yeslam Bin Ladin and the Bin Ladin family is based on continuous contact -- both in person and telephonically as frequently as on a weekly basis -- with certain Bin Ladin family members through 1998, cherished Saudi friends through 2002 and highly reliable Saudi sources for my book "Inside the Kingdom" through 2002.
11. I finally stopped all communication with my Saudi family, friends and sources for my book only after the publication of my book in 2002.
12. Consistent with my February 1, 2006 affidavit and contrary to Defendant's assertions in his Motion to Strike, I wrote the following in 2002 in the forward to my book, "Although for obvious reasons, I have not returned to Saudi Arabia in recent years, I

continue to discuss events there with my friends inside the kingdom.” “Inside the Kingdom” at x.

13. I reaffirm that my representations to this Court, both in my February 1, 2006 affidavit and herein, are premised on my own personal knowledge of Yeslam Bin Ladin and the Bin Ladin family from having been married and legally embroiled with them for the last thirty two years of my life.

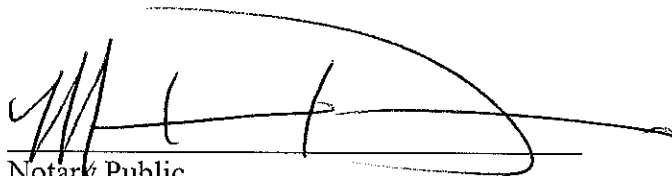
FURTHER THE AFFIANT SAYETH NOT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19 day of April, 2006.


CARMEN BIN LADIN

New York, New York

Subscribed and sworn to before me this 19th day of April 2006,


Notary Public

MAURICE DANCER
Notary Public, State of New York
No. 01DA6087212
Qualified in New York County
Commission Expires February 10, 20 07



FORMAT FOR
PRINTING
sponsored by



April 5, 2006


PAGE ONE

At His Geneva Shop, Yeslam Bin Ladin Faces Family Trouble

**Ex-Wife's Claims Complicate
A Luxury Entrepreneur's
Role in Terror Lawsuit**

By **GLENN R. SIMPSON**
April 5, 2006; Page A1

DOW JONES REPRINTS

 This copy is for your personal, non-commercial use only. To order presentation-ready copies for distribution to your colleagues, clients or customers, use the Order Reprints tool at the bottom of any article or visit: www.djreprints.com.

- [See a sample reprint in PDF format.](#)
- [Order a reprint of this article now.](#)

GENEVA -- A prominent entrepreneur in this posh Swiss city is seeking to build a luxury-goods business by turning his first name into a new brand: Yeslam.

It's a daunting task. Yeslam's last name is Bin Ladin. His half-brother is the world's most wanted terrorist.

American trial lawyers working for victims of the Sept. 11 attacks are suing Yeslam, along with other members of his family and other wealthy Saudis, for billions of dollars, contending they have hidden financial connections to Osama bin Laden (the surname is sometimes spelled differently). Now Yeslam's ex-wife, Carmen, has joined forces with the Sept. 11 victims' lawyers, as she tries to improve her divorce settlement by exposing her ex-husband's finances.



Yeslam Bin Ladin

The lawsuit, which is being heard in lower Manhattan at the U.S. District Court for the Southern District of New York, is drawing attention to potentially serious allegations against Mr. Bin Ladin. His ex-wife, who has been investigating his assets for years, has given the 9/11 lawyers a long list of offshore companies that she says he runs. In a court filing, she claims that "the bin Laden family including Yeslam and Osama were very close" -- and that his complex finances, also a focus of police investigators in several countries, support suspicions that the half-brothers have had financial ties.

In an interview and in court statements, Mr. Bin Ladin says he barely knows Osama, and hasn't seen his half-brother in more than 20 years. He hopes to extricate himself from the 9/11 lawsuit, which seeks to establish who gave clandestine support to Osama after he declared war on the U.S. in 1996.

Behind the legal battle is a family drama that illustrates Yeslam's unusual position in the secretive Bin Ladin clan. Born in Saudi Arabia and educated in the U.S., the 56-year-old Yeslam has long struggled to straddle the cultural divide between his native Saudi Arabia and the West.

His failed marriage to the Swiss-born Carmen was the subject of her 2004 book, "Inside the Kingdom," a best-seller in the U.S. Their eldest daughter, who goes by the name Wafah Dufour, is an aspiring pop musician and model in New York who recently posed for a risque photo shoot in GQ magazine. She has signed with Regan Media, a division of **News Corp.**'s HarperCollins Publishers, to star in a proposed American reality television show about her life. The show hasn't yet been picked up by a network.

The setting for much of the family contretemps is Geneva, a city favored by rich Saudis who patronize its discreet banks. Mr. Bin Ladin sometimes bumps into his daughters on the Rue du Marche, Geneva's pricey main street. He says those encounters are cordial, but he acknowledges that his daughters were once denied admission to a posh party he hosted. Mr. Bin Ladin and his daughters have seldom spoken in recent years. Each side blames the other for the estrangement.

Mr. Bin Ladin says he leaves the fighting to his lawyers and focuses on his various ventures, which include backing films and mounting a huge soiree at the annual film festival in Cannes. "I am having fun," he said during a recent Friday visit to his Geneva boutique. Clean-shaven and clad in a casual sport jacket, Mr. Bin Ladin was conducting business during the day of rest for observant Muslims, while fingering worry beads, a traditional Arab practice.

The Yeslam shop offers expensive perfume, handbags, sunglasses and watches by European designers largely geared to a wealthy Arab female clientele. Yeslam handbag models are named for historic Muslim cities including Jedda and Riyadh.

"Conjugating the historical sophistication of the orient with the demands of today's world," reads the glossy Yeslam catalogue. Mr. Bin Ladin trademarked his first name. A European court turned down Mr. Bin Ladin's effort to trademark his last name, saying it would be "contrary to public policy."

Mr. Bin Ladin is one of 54 children of a construction magnate who made billions of dollars building palaces and other projects for the Saudi royal family. Yeslam married Carmen in 1974 and graduated from the University of Southern California three years later. They settled in Switzerland in 1985.



Carmen bin Ladin

Since their divorce in 1994, Carmen has pursued her ex-husband through the Swiss courts, seeking a larger divorce settlement than the one that pays her and her three daughters support of about 9,000 Swiss francs, or about \$6,900, a month. In an interview, she says she originally agreed to that amount in exchange for a promise from Yeslam not to take their girls to Saudi Arabia.

Last week, a Swiss federal court rejected Ms. Bin Ladin's appeal of the existing settlement. She says she now hopes to go through the U.S. legal system to pressure her ex-husband to revise the settlement.

Ms. Bin Ladin claims to have discovered 76 offshore companies with connections to her ex-husband in the Bahamas and other tax havens -- claims that corporate records support. She says in her affidavit in the 9/11 case that 11 of the companies are U.S. businesses -- which could make it hard for Yeslam to convince the court that he isn't subject to U.S. jurisdiction. She says Mr. Bin Ladin has more than \$100 million in assets.

Mr. Bin Ladin says all his companies are legitimate and no longer do business in the U.S. He says his net worth is in the low tens of millions of dollars. His defense lawyers have asked a federal judge to reject Ms. Bin Ladin's affidavit as hearsay. "I have not talked to my ex-wife since 1994. How would she know anything?" Mr. Bin Ladin scoffs.



The controversy is taking place amid police investigations involving Mr. Bin Ladin. Since 2003, he has been the subject of money-laundering and terrorism-finance inquiries by police in Italy and France, according to documents obtained by the NEFA Foundation, a terrorism-research group funded by private donations that works with the 9/11 families.

Mr. Bin Ladin said he has already been cleared by the Swiss government of ties to terrorism after a massive 2002-2003 inquiry and knows of no other investigations.

A white leather Riyadh handbag sold at Yeslam Bin Ladin's Geneva boutique.

The French and Italian investigators have complained that the Swiss government isn't cooperating with their inquiries, Swiss government records show. One Italian police letter alleges Mr. Bin Ladin has a secret immunity deal with the Swiss government. Swiss prosecutors wouldn't comment on the subject of Mr. Bin Ladin. Mr. Bin Ladin dismissed the Italian claim, saying, "If I had immunity, I would not have had 80 policemen in my place" during a 2002 Swiss raid.

Mr. Bin Ladin says he hasn't been involved with Osama in any way since the early 1980s. Italian police think otherwise. They are investigating alleged dealings among Yeslam, Banca Svizzera Italiana, and a Switzerland-based, Saudi-founded investment firm called Dar Al Mal. A 2005 Italian financial-police memo from Milan claims the bank "has been sort of a hidden patrimonial manager of the activities linked to Osama bin Laden and his lieutenant Ayman al-Zawahiri."

Banca Svizzera declined to comment, citing Swiss bank-secrecy laws. Dar Al Mal said neither Osama nor Yeslam is a client but that another relative was once on its board. Dar Al Mal said it isn't under investigation by Italian police.

Yeslam Bin Ladin acknowledges family connections to Banca Svizzera and Dar Al Mal. "I have a brother who works with them," he said, declining to say which one. "All I can say is, it's not me."

Write to Glenn R. Simpson at glenn.simpson@wsj.com¹

URL for this article:

<http://online.wsj.com/article/SB114420394781617384.html>

Hyperlinks in this Article:

(1) <mailto:glenn.simpson@wsj.com>

Copyright 2006 Dow Jones & Company, Inc. All Rights Reserved

This copy is for your personal, non-commercial use only. Distribution and use of this material are governed by our **Subscriber Agreement** and by copyright law. For non-personal use or to order multiple copies, please contact Dow Jones Reprints at 1-800-843-0008 or visit www.djreprints.com.

A window on the world.

TIMES ONLINE

PRINT THIS ARTICLE



CLICK HERE TO PRINT

CLOSE WINDOW

The Sunday Times

April 09, 2006

Bin Laden clan split as ex-wife joins 9/11 lawsuit

TONY ALLEN-MILLS, NEW YORK

HE inhabits what he calls "the high-end universe of luxury" and dreams of turning his first name, Yeslam, into an international marketing brand, like Chanel, Dior, Gucci or Prada. This month he is adding a line of expensive watches to the handbags, perfumes, belts and sunglasses that he already sells under the Yeslam label.

There is only one snag for the fashion world's latest self-styled "créateur". His last name is Bin Ladin and his plans to expand his Geneva-based luxury goods empire are under siege because of his family ties to the world's most wanted terrorist.

As the half-brother of Osama Bin Laden, Yeslam Bin Ladin has endured his share of official scrutiny since the attacks of September 11, 2001. Despite his repeated claims that he has had nothing to do with Osama for more than 20 years, Bin Ladin's business dealings are once again under a microscope thanks to an improbable alliance between the families of the September 11 victims and a vengeful former wife.

With a new affidavit recently filed in a New York court, Bin Ladin's ex-wife, Carmen, has joined a legal battle waged by the families who are suing Yeslam and other members of the Saudi Arabia-based Bin Laden clan for their alleged financial support of Osama.

The affidavit, a copy of which has been obtained by The Sunday Times, claims that Bin Ladin and members of his family have gone to extraordinary lengths to hide their business dealings in America. Carmen also swore under oath: "The Bin Ladens have not turned their back on Osama and never will."

As he lurks in hiding from his American pursuers, Osama may be wondering what his family is coming to. It was Bin Ladin's daughter Wafah Dufour, an aspiring singer, who recently posed naked except for high heels and strategically placed ostrich feathers for a US men's magazine under the headline "It isn't easy being the sexy Bin Laden".

Bin Ladin has long protested that he had nothing to do with 9/11, that he does no business in the United States and that the Swiss government cleared him of connections to terrorism after a two-year inquiry. His lawyers are seeking to remove his name from the



families' New York lawsuit.

That task has been complicated by Carmen, a Swiss national who was divorced from Bin Ladin in 1988 and who later wrote *Inside the Kingdom*, a bestselling account of her life in Saudi Arabia.

She claimed to have spent the past eight years investigating her ex-husband's finances as part of a legal battle over their divorce settlement. She claimed in the affidavit that Bin Ladin operated about 76 companies "at least 11 of which are US businesses".

She also claimed that members of the Bin Laden family routinely transferred assets to each other "at their convenience to protect their interests". When she sued for a share of a Los Angeles property previously owned by Bin Ladin, she claimed that he "transferred ownership of this property to his brother Ibrahim to avoid equitable distribution".

Bin Ladin told *The Wall Street Journal* last week that his lawyers were seeking to strike down Carmen's affidavit as hearsay: "I have not talked to my ex-wife since 1994. How would she know anything?"

Bin Ladin has said he would pay for his half-brother's defence should Osama ever be bought to justice. He has also dodged questions about whether he would turn Osama in if he knew where he was. But now he has more pressing matters. The luxury goods market is highly competitive and he has a new line of handbags to sell.

Additional reporting: Abul Taher

Copyright 2006 Times Newspapers Ltd.

This service is provided on Times Newspapers' **standard Terms and Conditions** . Please read our **Privacy Policy** . To inquire about a licence to reproduce material from The Times, visit the **Syndication website** .